

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
LESTER LAWRENCE VOGELSONG,	:	CASE NO. 1:21-bk-00337
JR	:	
aka Lester Lawrence Vogelsong; fdba	:	
Lester Vogelsong Painting Contractor	:	
	:	
	:	
Debtor(s)	:	
	:	
U.S. BANK TRUST NATIONAL	:	
ASSOCIATION NOT IN ITS INDIVIDUAL	:	
CAPACITY BUT SOLELY AS OWNER	:	
TRUSTEE FOR RCAF ACQUISITION	:	
TRUST	:	
Movant	:	
	:	
vs.		
LESTER LAWRENCE VOGELSONG,		
JR		
aka Lester Lawrence Vogelsong; fdba		
Lester Vogelsong Painting Contractor		

Respondent(s)

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted; however, the debtor mistakenly believed that the mortgage company was paying the real estate taxes and insurance.
8. Admitted; see response to paragraph 7.
9. Admitted that the sums seem approximately correct; see response to paragraph 7.

10. Admitted that the sums seem approximately correct; see response to paragraph 7.
11. Admitted. Movant is protected by an equity cushion of over \$250,000.00.
12. Denied that Movant is entitled to relief. Movant is protected by an equity cushion of over \$250,000.00 and Debtor will cure the advances either through a loan modification or PAHAF assistance.
13. Denied.
14. Denied.
15. Denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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